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Attorneys for Defendants
Addus Healthcare, Inc. and
Addus HomeCare Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

MARY MOORE, ALEXANDRIA
ENCINIAS, individually, and on
behalf of other members of the
general public similarly situated;

Plaintiffs,

VS.

ADDUS HEALTHCARE, INC., an unknown business entity; ADDUS HOMECARE, INC., an unknown business entity; and DOES 2 through 100, inclusive.

Defendants.

Case No. 4:19-CV-01519-HSG

[Assigned to Hon. Haywood S. Gilliam, Jr.]

CLASS ACTION

**FURTHER JOINT STIPULATION AND
ORDER REGARDING BRIEFING
SCHEDULE ON PLAINTIFFS' MOTION
TO STRIKE PORTIONS OF
DEFENDANTS' AMENDED ANSWER**

Date Action Filed: July 11, 2017
First Am. Complaint Filed: March 21, 2019
Date Removal Filed: March 22, 2019

STIPULATION

This stipulation is entered into by and among Plaintiffs Mary Moore and Alexandria Encinias (collectively, “Plaintiffs”) and Defendants Addus Healthcare, Inc. (“Addus”) and Addus HomeCare Corporation (“Addus HomeCare,” and erroneously identified in the First Amended Complaint as “Addus HomeCare, Inc.”) (collectively, “Defendants”), by and through their respective counsel, in light of the following facts:

1. WHEREAS, Plaintiffs filed their motion to strike portions of Defendants' amended answer to Plaintiffs' first amended complaint on May 3, 2019.

2. WHEREAS, Plaintiffs' motion to strike is set for hearing on August 29, 2019.

3. WHEREAS, the parties previously filed a stipulation on May 17, 2019, seeking an extension of time to file their respective briefs to provide the parties with an opportunity to meet and confer regarding Defendants amending their answer to Plaintiffs' first amended complaint in order to address the concerns raised in Plaintiffs' motion.

4. WHEREAS, on May 20, 2019, the Court approved the stipulation and extended the deadlines for Defendants' opposition and for Plaintiffs' reply to Plaintiffs' motion to strike, to May 31, 2019, and June 7, 2019, respectively.

5. WHEREAS, the parties now seek an additional extension of time to file their respective briefs to allow the parties to continue the meet and confer process regarding Defendants amending their answer in order to resolve the concerns raised in Plaintiffs' motion.

6. WHEREAS, the parties propose a seven (7) day extension of Defendants' time to file their opposition and for Plaintiffs' to file their reply to Plaintiffs' motion to strike, to June 7, 2019 and June 14, 2019, respectively.

1 7. WHEREAS, the requested extension of time for each side to respond does
2 not impact any other dates in this action, including the August 29, 2019 hearing date for
3 Plaintiffs' motion.

4 8. WHEREAS, this stipulation is made for good cause and not for the purpose
5 of delay.

6 **IT IS SO STIPULATED.**

7 Dated: June 3, 2019

8 **AKIN GUMP STRAUSS HAUER &**
9 **FELD LLP**
10 GREGORY W. KNOPP
11 GARY M. MCLAUGHLIN
12 VICTOR A. SALCEDO

13 By /s/ Gary M. McLaughlin
14 Gary M. McLaughlin**
15 Attorneys for Defendants
16 Addus Healthcare, Inc. and
17 Addus HomeCare Corporation

18 Dated: June 3, 2019

19 **LAWYERS for JUSTICE, PC**
20 Edwin Aiwazian
21 Arby Aiwazian
22 Tara Zabehi

23 By /s/ Edwin Aiwazian
24 Edwin Aiwazian
25 Attorneys for Plaintiffs
26 Mary Moore and Alexandria Encinias

27 **Pursuant to L.R. 5-1(i)(3), I attest that concurrence in the filing of this document
28 has been obtained from each of the other signatories.

ORDER

IT IS HEREBY ORDERED, good cause appearing, that:

1. The deadline for Defendants' opposition to Plaintiffs' motion to strike portions of Defendants' amended answer to Plaintiffs' first amended complaint is hereby continued seven (7) days and is to be filed by June 7, 2019.

2. The deadline for Plaintiffs' reply to Defendants' opposition to Plaintiffs' motion to strike portions of Defendants' amended answer to Plaintiffs' first amended complaint is hereby continued seven (7) days and is to be filed by June 14, 2019.

Dated: June 3, 2019

Haywood S. Gill Jr.
The Honorable Haywood S. Gilliam, Jr.